

Simon Miller (SM 6278)
Elizabeth Prickett-Morgan (EP 7536)
GREENBERG TRAURIG, LLP
200 Park Avenue
New York, New York 10166
Tel: (212) 801-9200
Fax: (212) 801-6400

Attorneys for Defendants Elbit Systems Ltd., Michael Federmann, Joseph Ackerman, Joseph Gaspar, and Estate of Jacob Toren

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
STEPHEN M. WILSON, BRW ENGINEERING	:
LTD., WIS PARTNERS LTD., MOSHE BAR-	:
LEV, PATRICK ROSENBAUM, MICHAEL	:
MORRIS, HAIM YIFRAH, TOP DOWN	:
PARTNERS, LLC, JOEL LEVINE, MORRIS	:
TALANSKY, ABRAHAM MOSHEL, MAGMA	:
INTERNATIONAL SERVICES, LTD., ALBERT	:
REICHMANN, HEXAGRAM & CO., and	:
POLYBUTES COMPANY,	:
	:
Plaintiffs,	:
	:
vs.	:
	:
IMAGESAT INTERNATIONAL N.V., ISRAEL	:
AEROSPACE INDUSTRIES LTD., ELBIT	:
SYSTEMS LTD., MOSHE KERET, IZHAK	:
NISSAN, JACOB WEISS, MENASHE BRODER,	:
SHIMON ECKHAUS, MICHAEL FEDERMANN,	:
ESTATE OF JACOB TOREN, JOSEPH	:
ACKERMAN, JOSEPH GASPAR, GINO	:
PIPERNO-BEER, JAMES DEPALMA, DAVID	:
ARZI, YOAV CHELOUCHE, and YEHOASHUA	:
ELDAR,	:
	:
Defendants.	:
-----	X

CV-07-6176 (LTS)

**INITIAL DISCLOSURES OF
DEFENDANTS
ELBIT SYSTEMS LTD., MICHAEL
FEDERMANN, JOSEPH
ACKERMAN, JOSEPH GASPAR,
AND THE ESTATE OF JACOB
TOREN PURSUANT TO RULE
26(A)**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants Elbit Systems Ltd. ("Elbit"), Michael Federmann, Joseph Ackerman, Joseph Gaspar, and the Estate of Jacob Toren (collectively, "Elbit Defendants") hereby provide their Initial Disclosures. These Initial Disclosures are based upon good faith inquiry and information now known and reasonably available to the Elbit Defendants. These Initial Disclosures are made expressly subject to and without waiving any applicable privileges or exemptions from discovery and any right to a protective order. The Elbit Defendants reserve the right to amend or supplement these disclosures, as well as other discovery responses, pursuant to Fed. R. Civ. P. 26(e). In addition, the following disclosures are made subject to and without waiving:

- (i) any objections as to competency, relevancy, materiality or admissibility in any subsequent proceedings or the trial of this or any other action;
- (ii) the right to object to the use of these disclosures or documents and information obtained as a result of these disclosures, or the subject matter thereof, in any subsequent proceedings or the trial of this or any other action; and
- (iii) the right to object to any demand for further disclosures or to other discovery involving or relating to the subject matter of these disclosures.

**I. INDIVIDUALS/ORGANIZATIONS LIKELY TO HAVE
DISCOVERABLE INFORMATION ON WHICH THE ROSENS
MAY RELY IN SUPPORTING THEIR CLAIMS AND DEFENSES.**

Based on the information now known or reasonably available to them, the Elbit Defendants believe that the following individuals or organizations may have discoverable information that the Elbit Defendants may use to support defenses in this action:

Haim Rousso
Industrial Science Park
P.O.B. 1165
Rehovot 76111
Israel
Tel: 972-8-9386756

Joseph Gaspar
Advanced Technology Center
P.O.B 539
Haifa 31053
Israel
Tel: 972-4-8316404

Joseph Ackerman
Advanced Technology Center
P.O.B. 539
Haifa 31053
Israel
Tel: 972-4-8315526/972-4-8550177

Michael Federmann
87 Hayarkon St.
Tel-Aviv
Yafo 63432
Israel
Tel: 972-3-5241135

Tova Toren
10 Havered St.
Nes-Ziona 74063
Israel
Tel: 972-8-9403053

David Block Temin
Advanced Technology Center
P.O.B 539
Haifa 31053
Israel
Tel: 972-4-8316626/972-4-8317908

Avigdor Blasberger
Address and telephone number to be determined

Elbit Systems Ltd.
Advanced Technology Center
P.O.B 539
Haifa 31053
Israel
Tel: 972-4-8316626/972-4-8317908

Elbit Systems
Electro-Optics
Elop Ltd.
Industrial Science Park
P.O.B. 1165
Rehovot 76111
Israel
Tel: 972-8-9386432

**II. DOCUMENTS ON WHICH THE ELBIT DEFENDANTS MAY RELY
IN SUPPORTING THEIR DEFENSES.**

The Elbit Defendants intend to rely on Elbit's corporate books and records in supporting their defenses. These documents are maintained at the following address:

Elbit Systems Ltd.
Advanced Technology Center
P.O.B 539
Haifa 31053
Israel
Tel: 972-4-8316626/972-4-8317908

III. INSURANCE AGREEMENTS

The Elbit Defendants are covered by the following insurance agreement, a copy of which will be provided to Plaintiffs under separate cover, which may be available to satisfy all or part of any judgment against the Elbit Defendants:

CorporateGuard for Directors and Officers
Policy No. 2520000687/06
Issued to: Elbit Systems Ltd.
By: Migdal Insurance Company

Dated: New York, New York
October 10, 2007

Respectfully submitted,

GREENBERG TRAUB, LLP

By: 

Simon Miller (SM 6278)
Elizabeth Prickett-Morgan (EP 7536)
200 Park Avenue
New York, New York 10166
(212) 801-9200

Stephen C. Carlin
Peter S. Wahby
2200 Ross Avenue, Ste. 5200
Dallas, Texas 75201
(214) 665-3600
*(Pro Hac Vice applications
forthcoming)*

*Attorneys for Defendants
Elbit Systems Ltd., Michael Federmann,
Joseph Ackerman, Joseph Gaspar, and
Estate of Jacob Toren*

To: Ira Brad Matetsky
GANFER & SHORE, LLP
360 Lexington Avenue
New York, New York 10017
(212) 922-9250
Fax: (212) 922-9335